



PACHULSKI STANG ZIEHL & JONES LLP

Debra I. Grassgreen (CA Bar No. 169978)

Jason H. Rosell (CA Bar No. 269126)

One Sansome Street, Suite 3430

San Francisco, California 94104

Telephone: (415) 263-7000

Facsimile: (415) 263-7010

E-mail: dgrassgreen@pszjlaw.com

jrosell@pszjlaw.com

Signed and Filed: December 6, 2023

A handwritten signature in black ink, appearing to read "Hannah L. Blumenstiel", is written over a horizontal line.

HANNAH L. BLUMENSTIEL

U.S. Bankruptcy Judge

*Counsel to the Debtor*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

INTERNATIONAL LONGSHORE  
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662-HLB

Chapter 11

**AMENDED ORDER SETTING SCHEDULE  
IN CONNECTION WITH PLAN  
CONFIRMATION PROCESS AND  
RELATED DEADLINES**

Status Conference:

Date: January 18, 2024

Time: 10:00 a.m. (Pacific Time)

Place: Zoom / Telephonic

Judge: Hon. Hannah L. Blumenstiel

The Court having held a scheduling conference on October 19, 2023 to discuss (i) a date and time for convening a hearing on confirmation (the "Confirmation Hearing") of the *Plan of Reorganization for Small Business Under Chapter 11* [Docket No. 18] filed by the above-captioned debtor and debtor in possession (the "Debtor"), (ii) deadlines for briefing in advance of the Confirmation Hearing, and (iii) deadlines for conducting any discovery that might be necessary prior to the Confirmation Hearing; and the Debtor having filed and served its amended *Plan of Reorganization for Small Business Under Chapter 11* [Docket No. 60] (the "Plan") on November 2, 2023 and having transmitted via email a form of ballot to counsel to ICTSI Oregon, Inc.;

1           **IT IS HEREBY ORDERED THAT:**

2           **Plan Solicitation Deadlines**

3           1.     **Status Conference.** The Court will hold a status conference on **January 18, 2024 at**  
4 **10:00 a.m. (Pacific Time)** (the “Status Conference”).

5           2.     **Pre-Trial Conference.** The Court will hold a pre-trial status conference on **February**  
6 **15, 2024 at 10:00 a.m. (Pacific Time)** (the “Pre-Trial Conference”) at which time the Court will (i)  
7 set the deadline for the Debtor to file its brief in support of confirmation of the Plan and (ii) schedule  
8 the Confirmation Hearing (which hearing will take place, subject to the Court’s calendar and  
9 availability, the week of March 25-29, 2024).

10          3.     The Status Conference and Pre-Trial Conference will not be conducted in the presiding  
11 judge’s courtroom but instead will be conducted by telephone or video. All interested parties should  
12 consult the Bankruptcy Court’s website (<https://www.canb.uscourts.gov/>) for information explaining  
13 how to arrange an appearance at a video/telephonic hearing. If you have questions about how to appear  
14 at the court hearing and participate in the video hearing, you may contact the court by calling 888-  
15 821-7606 or by using the Live Chat feature on the Court’s website.

16          4.     On or before **December 11, 2023**, the Debtor shall serve a copy of this Order on the  
17 United States Trustee, the Subchapter V Trustee, and all creditors and other parties in interest. Within  
18 seven (7) calendar days of the completion of service of the foregoing, the Debtor shall file a certificate  
19 of service demonstrating compliance with this paragraph.

20          5.     On or before **February 5, 2024**, ICTSI Oregon, Inc., and all other creditors and other  
21 parties in interest entitled to vote on the Plan shall transmit written notice of their acceptance or  
22 rejection of the Plan to counsel to the Debtor.

23          6.     On or before **February 9, 2024**, the Debtor shall file its ballot summary.

24          7.     On or before **February 13, 2024**, ICTSI Oregon, Inc. and all other creditors or other  
25 parties in interest that wish to object to confirmation of the Plan must file and serve such written  
26 objection.  
27  
28

1           **Plan Discovery Deadlines**

2           8.     Fact Discovery. Fact discovery (other than depositions) shall be completed by  
3     **December 22, 2023** (the “Fact Discovery Deadline”). As to written and production discovery,  
4     responses must be due before the Fact Discovery Deadline. The Court will attempt to resolve all  
5     discovery disputes on an expedited basis via telephonic conference, which any party may initiate by  
6     request to the Court's Courtroom Deputy and notice to the other party after they have met, conferred,  
7     and made a good faith effort to resolve the dispute. The party requesting the conference should submit  
8     a brief letter explaining the issues to be presented. Notwithstanding the foregoing, as set forth in the  
9     Court's *Second Order Regarding Discovery Dispute* [Docket No. 105], any discovery issues initiated  
10    by ICTSI Oregon, Inc. shall be done via a motion noticed pursuant to B.L.R. 9014-1(c)(1).

11          9.     Deadline to Serve Discovery Requests. The last day for any party to serve discovery  
12    requests is **December 1, 2023**.

13          10.    Responses to Discovery Requests. The deadline to (i) serve written responses to  
14    discovery requests and (ii) begin document production shall be 14 calendar days after service of such  
15    discovery requests. The deadline to substantially complete document production shall be 21 calendar  
16    days after service of discovery requests.

17          11.    Deadline to Complete Depositions. Notwithstanding the Fact Discovery Deadline,  
18    depositions that were timely noticed and served in accordance with this Order must, absent mutual  
19    agreement of the parties, be completed by **January 31, 2024**. Completion means that depositions  
20    must be concluded, although not necessarily transcribed.

21          12.    Expert Discovery and Evidence. Direct evidence must be presented by a declaration  
22    that authenticates the report of the expert. See FRCP 26(a)(2)(B), incorporated via Fed. R. Bankr. P.  
23    7026. Each party must file and serve declarations of experts and other documentary evidence related  
24    thereto no later than February 16, 2024. A party that intends to offer an expert solely to contradict or  
25    rebut evidence on the same subject matter identified by another party must file and serve the  
26    disclosures required by Rule 26(a)(2) by March 1, 2024. FRCP 26(a)(2)(D)(ii).

27                               **\*\* END OF ORDER \*\***

1 **ACKNOWLEDGED AND AGREED TO FORM:**

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3 /s/ Ori Katz

4 Ori Katz (California Bar No. 209561)

5 Gianna Segretti (California Bar No. 323645)

6 Koray Erbas (California Bar No. 332877)

Four Embarcadero Center, 17th Floor

San Francisco, California 94111-4109

Telephone: 415.434.9100

Facsimile: 415.434.3947

Email okatz@sheppardmullin.com

gsegretti@sheppardmullin.com

kerbasi@sheppardmullin.com

9 *Attorneys for ICTSI Oregon, Inc.*

Court Service List

Registered ECF participants.

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